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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING,
SALES PRACTICES AND PRODUCTS
LIABILITY LITIGATION

Case No. 3:16-md-2738 (MAS)/(RLS)

MLD Case No. 2738

[FILED ELECTRONICALLY]

Return Date: July 1, 2024

**NOTICE OF MOTION TO QUASH
AND/OR FOR PROTECTIVE
ORDER**

PLEASE TAKE NOTICE that, at 9:00 a.m. on July 1, 2024, or at such other time as set by the Court, non-party Beasley, Allen, Crow, Methvin, Portis & Miles, P.C., (Beasley Allen), through its attorneys Fox Rothschild LLP, will move for the entry of an Order quashing the subpoena issued to Beasley Allen [ECF Doc. Number 32201]).

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, Beasley Allen will rely upon the Memorandum of Law submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Beasley Allen seeks oral argument only if the

motion is opposed.

Executed on May 30, 2024

/s/ Jeffrey M. Pollock
JEFFREY M. POLLOCK, ESQ.

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

Respectfully submitted,

/s/ Jeffrey M. Pollock

JEFFREY M. POLLOCK, ESQ.